

Koch, Kristine

From: Koch, Kristine
Sent: Tuesday, November 24, 2015 10:57 AM
To: Carl Stivers
Cc: Cora, Lori
Subject: FW: Please provide a response to this.

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency
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From: Coffey, Scott [mailto:CoffeySE@cdmsmith.com]
Sent: Thursday, November 12, 2015 5:32 PM
To: Koch, Kristine <Koch.Kristine@epa.gov>
Cc: Allen, Elizabeth <allen.elizabeth@epa.gov>; Blischke, Eric <blischkee@cdmsmith.com>; Foster, Malena L. <fosterm1@cdmsmith.com>; Gustavson, Karl <Gustavson.Karl@epa.gov>
Subject: RE: Please provide a response to this.

Hi Kristine.

Here is a response to the information request RE Section 3.3.2.3:

Section 3.3.2.3 refers to the technology assignment matrix presented in the revised FS. As described in Figure 3.3-26, areas that did not receive a score (e.g., they did not meet any of the criteria presented in Figure 3.3-14) were assigned EMNR unless the 25 year event shear stress exceeds the critical shear stress for EMNR design material. In that case, capping was assigned. Consequently, all areas within the site are assigned a score with the exception of previously remediated areas.

Please note: For the current configuration we are not assigning EMNR outside of Swan Island lagoon. The new technology assignment matrix will consist of Capping, Armored Cap, and Dredge. The new technology assignments will be addressed in the updated FS document.

The criteria and scoring process referred to in the question is only one step in a multi-step process that defines what technology (including MNR) is assigned to a specific area (10 x 10 ft pixel). It is important to recognize that the technology assignment matrix is only the first step in assigning the technology for a given area. Subsequent steps consider additional factors such as the depth of contamination, the presence of PTW, etc. as presented in the Technology Assignment Flow Charts. After applying all process steps and decision factors presented in Section 3, specific technologies (including MNR) are assigned to each specific 10x10 area. Please note: EPA is currently updating these technology assignment rules based on comments recently received by the stakeholders. Accordingly, the process and its description will be updated in the text in an updated FS document.

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Thursday, November 12, 2015 1:27 PM
To: Coffey, Scott <CoffeySE@cdmsmith.com>
Cc: Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Please provide a response to this.

They are going by what is in the text, which is silent on what is done. We will need to add some language to clarify.

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From: Coffey, Scott [<mailto:CoffeySE@cdmsmith.com>]
Sent: Thursday, November 12, 2015 1:25 PM
To: Koch, Kristine <Koch.Kristine@epa.gov>
Cc: Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Please provide a response to this.

No problem. I should have a response for you today. I think the simple answer is that PRPs that prepared the comment are not realizing the additional processing that goes into assigning the technology. It involves multiple steps.

We'll get you an articulate response.

Scott

----- Original message -----
From: "Koch, Kristine"
Date: 11/12/2015 8:54 AM (GMT-08:00)
To: "Coffey, Scott"
Subject: Please provide a response to this.

EPA states in Section 3.3.2.3 that there are instances when an area does not receive a technology score (an outcome when the areas does not achieve a threshold for any of the criteria). Please provide the technical memoranda, communications, and other documents that address or explain what technology is assumed for those areas?

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